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1. UNDERGROUND SOURCES OF DRINKING WATER

This Attachment was prepared in support of Excelsior Mining Arizona, Inc.'s (Excelsior's) Underground Injection Control (UIC) Permit application to the United States Environmental Protection Agency (USEPA). Excelsior is applying for an area Class III UIC permit to install a wellfield for in-situ recovery (ISR) of copper at the Gunnison Copper Project (Project), located in Cochise County, Arizona.

This attachment includes maps and cross sections that depict the vertical limits of underground sources of drinking water (USDWs) within the Area of Review (AOR) as defined in Attachment A of this UIC application. Figure D-1 shows the surficial geology of the Project area, Figure D-2 shows the bedrock surface geology, and figures D-3, D-4, and D-5 are cross sections through the AOR that show USDWs (shaded), the injection formation, and the direction of water movement.

The following units within the AOR are considered USDWs:

- Saturated Basin Fill, where saturated;
- Bedrock in the oxide zone, where saturated;
- The top 200 feet of the sulfide zone;
- Tertiary quartz monzonite.

The USDW within the AOR is saturated, fractured Paleozoic bedrock in the oxide zone. Basin fill (alluvium) above bedrock is not a USDW because the basin fill does not meet the definition of a USDW according to Chapter 40 of the Code of Federal Regulations §144.3. Only thin, isolated occurrences of saturated basin fill occur within the proposed AOR; thus, it does not contain a "sufficient quantity of groundwater to supply a public water system." Additional discussion regarding the degree of saturated basin fill is provided in Attachment S of this UIC application.

The deeper bedrock (sulfide zone) is not a USDW for the following reasons:

- Two aquifer tests were conducted in the sulfide zone (NSH-014B and NSH-025) indicated hydraulic conductivity values of 0.001 ft/day and 0.03 ft/day. Two aquifer tests conducted in the sulfide zone (wells NSH-014B and NSH-025) indicated hydraulic conductivity values of 0.01 ft/day and 0.07 feet/day (Attachment A-3).
- Fracture intensity is lower in the sulfide zone than in the oxide zone (Attachment A-2).

Beryllium and fluoride exceeded the maximum contaminant level and Aquifer Water Quality Standard for beryllium and fluoride in 2015 (as discussed in Attachment H).

The vertical extent of the oxide zone will be further refined during drilling of the injection/recovery, hydraulic control, and observation wells in the AOR.

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The Tertiary Texas Canyon Quartz Monzonite (shown on Figure D-5) is also not a USDW, based on the hydraulic properties of the unit, as described in Attachment A-2.

Additional information regarding the regional geologic setting, orogenic history, and geologic formations is provided in Attachment F of this UIC Application.









